

*Via Email*

Michael Foley  
Director of Sustainability  
Cuyahoga County  
mfoley@cuyahogacounty.us

Dear Director Foley,

Thank you for taking my call and discussing the County's Ordinance and draft regulations regarding a scooter share program for Cuyahoga County ("County").

Our primary concerns are conflicts or duplication between the Cuyahoga County and Cleveland regulations. We are very supportive of the progress that the County and City of Cleveland ("City") have made towards bringing scooters to the greater Cleveland area through a single permitting program and fee structure.

There are still a few issues that we would like to raise in the current draft regulations:

1. Datasharing Requirements:

We are committed to sharing meaningful and actionable data with our municipal partners. We will work closely with staff to make the information useful and relevant for applications like compliance and city planning. Below are some data sets that we share:

- Usage (daily/quarterly/annually)
- Total miles (daily/quarterly/annually)
- Number of scooters in circulation
- Daily, weekly and monthly active riders (including members/walk-up renters)
- Number and duration of rides / scooter / day
- Number and duration of rides / scooter / day

In addition, we are also able to work with the city to put together monthly reports on such topics as:

- Incidents report and resolution with comments/complaints, theft/vandalism
- Types and counts of repairs conducted

However, we need further refinement of some of the data sets you have suggested:

#4: We work with public entities and law enforcement to make individual trip data available pursuant to appropriate legal procedure through our Law Enforcement Portal. However, providing raw trip data involves disclosure of Personally Identifiable Information (PII) raising both privacy and Civil Rights concerns. As you note in item #10, sharing data indiscriminately with unknown third parties or the public at large creates major privacy concerns and concerns about misuse or misconstruing data.

In addition, holding customers' PII would make the County vulnerable to hacking, and require the County to have the same levels of data security and technology as required of the private companies to ensure the security of the data.

#6 & 7: While we trust our municipal partners, as guardians of the public good, with our data subject to our data sharing agreement, it would be a liability both to the municipality and to our companies to release data to the public, and other unknown parties. As you note in item #10, sharing data indiscriminately with unknown third parties or the public at large creates major privacy concerns and concerns about misuse or misconstruing data. This is particularly true when data about origins and destinations on one vendor platform can be linked to data from sources like credit cards to track the location of specific individuals.

We outline explicitly to users a small group of third parties will be able to receive their information. This includes government entities in which we are required by law to share information, third parties that help service our IT infrastructure, and our third-party payment transaction providers.

#11: Riders need to grant access to their camera for access to our service. In order to lock/unlock the scooter, riders need to scan a QR code in our app. In addition, before riders are able to end a trip, we require them to take a photo of the parked vehicle. The act of taking the photo acts as a behavioral "nudge" to encourage proper parking behavior, and provides us with data on how our vehicles are being parked.

2. Lime employs a local team for its operations in every city we serve, including an Operations Manager, mechanics, and operations specialists. To ensure scooters are reliably charged, we also have a "Juicer" program. Ordinary people can request a charger from us, pick up a scooter, charge it, and return it to the street the next day. It is a low effort activity, people can earn a little extra money, and the city gets reliably charged scooters. Many people charge for Lime and other companies as well. Therefore, charging scooters should not be included in the list of activities exclusively reserved for employees.

Thank you in advance for your consideration in addressing our concerns. Please feel free to contact me at [ashley.scott@li.me](mailto:ashley.scott@li.me) if you would like to discuss further.

Best,

Shari Shapiro  
Director, Mid-Atlantic Government Relations  
Neutron Holdings, Inc. dba Lime